

SFIREG Issue Paper	Petition Response
Pesticide treated seeds should be more comprehensively regulated by EPA	This is addressed by the 3(a) rule in the response. This will give EPA the ability to regulate treated seeds without registration.
Concerns on the availability of data systems to track the active ingredients use in seed treatment products on specific commodities	This is something we are hoping to learn more about in the ANPRM but we acknowledge these data gaps in the petition response.
How can tracking of treated seeds be improved or accomplished?	See above.
Industry groups often cite that wide scale use of treated seeds is vital for crop production and the protection of seeds and emerging crops during the early growing season and that seed treatment reduces overall costs and pesticide use. Has EPA conducted the research to document the replacement and use reduction replacement of other types of applications and has EPA collected and evaluated such data to know the use and reduction data and statistics?	EPA has not conducted this research and I don't think there are plans to do so.
How are treated seed pesticide products included in risk assessments for the individual active ingredient reviews? The crops and food produced from treated seeds still need to meet the Food Quality Protection Act (FQPA) safety standards for reasonable certainty of no harm from consumption and exposure, and so how does EPA determine no adverse risk to humans or the environment if the treated seed aren't included in the risk assessments.	This is sort of discussed in the petition response but for most of the statements about assessment we address the petition response back to the assessment documents from registration review.
What is the potential wide-scale impact to pollinators including native pollinators and what assessments of the potential impacts has EPA conducted when the treated seeds are considered to be in the treated article exemption category?	See above.
How long do the seed treatment residues last in crop production locations, soil, and has EPA evaluated the fate and transport science and risk?	For the first part of this question we reference the assessment documents in the petition response but we state that EPA does evaluate the fate and transport science for treated seeds, if only qualitatively in the case of dust off.
What is the impact to non-target organisms and aquatic systems from use of treated seeds?	These questions on the assessments are referenced back to the assessment documents produced during registration review.
What are mechanisms to obtain better information on the use of treated seeds?	This is something we are hoping to look at in terms of the ANPRM.
Could stronger oversight of seed treatment applicators be considered as a measure to	This may be addressed by the 3(a) rule.

address issues with treated seeds? For example, their role related to the information that is required to be included on the seed bag tag/label.	
Can states use label information transferred onto seed bag tags to enforce under existing authorities? Would the EPA registration number printed on seed bag tags enhance this authority?	States can currently enforce whatever they want but with the 3(a) rule EPA is trying to make that more consistent. Currently EPA is putting language in place to put the EPA registration number on the seed bag tags.